

AO91 (Rev. 12/03) Criminal Complaint

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**UNITED STATES DISTRICT COURT**


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Southern District Of Texas Brownsville Division

**UNITED STATES OF AMERICA****CRIMINAL COMPLAINT****vs.**

Case Number: 1:18-po-0933

Roxana Elizabeth DE PAZ-Portillo  
A215 703 133 El Salvador

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about May 15, 2018 in Cameron County, in the Southern District Of Texas defendant(s) being then and there an alien, did, willfully, knowingly and unlawfully enter the United States at a time or place other than designated by an Immigration Officer,

in violation of Title 8 United States Code, Section(s) 1325(a)(1)

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

The defendant was apprehended in Brownsville, Texas on May 15, 2018. The defendant is a citizen of El Salvador who entered the United States illegally by rafting across the Rio Grande River near Brownsville, Texas on May 15, 2018 thus avoiding immigration inspection.

I DECLARE UNDER PENALTY OF PERJURY THAT THE STATEMENTS IN THIS COMPLAINT ARE TRUE AND CORRECT.

Continued on the attached sheet and made a part of this complaint:

☐ Yes ☒ No/S/ Perez1, Juan J. Border Patrol Agent

Signature of Complainant

Perez1, Juan J. Border Patrol Agent

Printed Name of Complainant

Sworn to before me and signed in my presence,

May 16, 2018

Date

at

Brownsville, Texas

City/State

Ignacio Torteya III

Name of Judge

U.S. Magistrate Judge

Title of Judge

  
Signature of Judge